

1 MAYER BROWN LLP
LEE H. RUBIN (SBN 141331)
lrubin@mayerbrown.com
2 EDWARD D. JOHNSON (SBN 189475)
wjohnson@mayerbrown.com
3 DONALD M. FALK (SBN 150256)
dfalk@mayerbrown.com
4 ANNE M. SELIN (SBN 270634)
aselin@mayerbrown.com
5 Two Palo Alto Square, Suite 300
3000 El Camino Real
6 Palo Alto, CA 94306-2112
Telephone: (650) 331-2000
7 Facsimile: (650) 331-2061

8 *Attorneys for Defendant*
9 *Google Inc.*

10
11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN JOSE DIVISION**

14 IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

15 THIS DOCUMENT RELATES TO:
16 ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**DECLARATION OF ANNE M. SELIN
IN SUPPORT OF DEFENDANTS'
RENEWED MOTION TO SEAL
MATERIALS IN CONNECTION WITH
SUMMARY JUDGMENT AND
DAUBERT MOTIONS AND
DEFENDANTS' MOTION TO STRIKE**

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21 I, Anne M. Selin, declare as follows:

22 1. I am an attorney with the law firm of Mayer Brown LLP, counsel for Defendant
23 Google, Inc. ("Google") in the above-captioned matter. I am admitted to practice law before this
24 Court. I submit this declaration in support of Defendants' Renewed Motion to Seal Materials in
25 Connection with Summary Judgment and Daubert Motions and Defendants' Motion to Strike
26 ("Renewed Motion to Seal") that is being filed concurrently herewith. As an attorney involved
27 in the defense of this action, unless otherwise stated, I have personal knowledge of the facts
28 stated in this declaration and if called as a witness I could and would competently testify to them.

2. I have reviewed the following expert reports that were filed as exhibits in connection with the parties' motions for summary judgment and motions to exclude or strike expert testimony, and which Google has identified and made specific and narrowly tailored redactions to: (a) Combined Expert Report of Elizabeth Becker, Ph.D dated November 25, 2013 ("Combined Becker Report"); (b) Expert Report of Kevin F. Hallock dated May 10, 2013 ("05/2013 Hallock Report"); (c) Expert Report of Kevin F. Hallock dated October 28, 2013 ("10/2013 Hallock Report"); (d) Expert Report of Edward E. Leamer, Ph.D dated October 1, 2012 ("10/2012 Leamer Report"); (e) Dr. Leamer's Reply Report dated December 2012 ("12/2012 Leamer Report"); (f) Dr. Leamer's Supplemental Report dated May 10, 2013 ("05/2013 Leamer Report"); (g) Dr. Leamer's Rebuttal Supplemental Report dated July 12, 2013 ("07/2013 Leamer Report"); (h) Dr. Leamer's Report dated October 28, 2013 ("10/2013 Leamer Report"); (i) Dr. Leamer's Report dated December 11, 2013 ("12/2013 Leamer Report"); (j) Expert Report of David Lewin, Ph.D. dated November 25, 2013 ("11/2013 Lewin Report"); (k) the Supplement to Dr. Lewin's Expert Report dated December 6, 2013 ("12/2013 Lewin Report"); (l) Expert Report of Alan Manning, Ph.D dated October 28, 2013 ("Manning Report"); (m) Rebuttal Report of Matthew Marx dated December 11, 2013 ("Marx Report"); (n) Expert Report of Professor Kevin M. Murphy dated November 12, 2012 ("11/2012 Murphy Report"); (o) Professor Murphy's Supplemental Expert Report dated June 21, 2013 ("06/2013 Murphy Report"); (p) Professor Murphy's Expert Report dated November 25, 2013 ("11/2013 Murphy Report"); (q) Expert Report of Edward A. Snyder, Ph.D dated December 6, 2013 ("Snyder Report"); (r) Expert Report of Dr. Lauren Stiroh dated November 25, 2013 ("Stiroh Report"); and (s) Expert Report of Eric Talley, Ph.D dated November 25, 2013 ("Talley Report").

3. In addition to the above expert reports, I have reviewed the following other documents and exhibits filed in connection with the parties' motions for summary judgment and motions to exclude or strike expert testimony, which Google has identified and made specific and narrowly tailored redactions to: (a) Defendant Google Inc.'s Notice of Motion and Motion for Summary Judgment ("Google's Motion for Summary Judgment") (ECF No. 564); (b) certain exhibits to the Declaration of Anne M. Selin in Support of Google's Motion for Summary

1 Judgment (“Selin Declaration”) (ECF No. 569); (c) certain exhibits to the Declaration of Dean
2 M. Harvey in Support of Plaintiffs’ Opposition Briefs Re Dkts. 554, 556, 557, 559, 560, 561,
3 564, 570 (“Harvey Declaration”) (ECF No. 607), (d) certain exhibits to the Declaration of Lisa J.
4 Cisneros in Support of Plaintiffs’ Opposition Briefs Re Dkts. 554, 556, 557, 559, 560, 561, 564,
5 570 (“Cisneros Declaration”) (ECF No. 605), and (e) certain exhibits to the Declaration of Eric
6 B. Evans in Support of Google Inc.’s Reply in Support of Its Motion for Summary Judgment
7 (“Evans Declaration”) (ECF No. 703).

8 4. Google previously sought to seal confidential Google information included in the
9 materials listed above. ECF Nos. 264-4, 587, 599-4, 668, and 704. The Court’s March 27, 2014
10 Case Management Order denied without prejudice the pending administrative motions to file
11 under seal. ECF No. 768. Defendants agreed to file narrower requests by April 10, 2014. *Ibid.*
12 Therefore and as described further below, Google is now filing more narrowly tailored redacted
13 versions of these materials, which Google respectfully requests this Court to allow to be
14 maintained under seal in redacted format in the public record. Proposed redacted versions of
15 these materials are being filed concurrently herewith.

16 5. The basis for Google’s proposed redactions, identified in paragraphs 6 to 29
17 below, can be found in the Declarations of Frank Wagner (Google’s Director of Compensation)
18 that were filed on October 9, 2012, November 12, 2012, and December 18, 2012 (ECF Nos. 201,
19 221, and 261 respectively) and the Declaration of Omid Kordestani (Google Advisor and former
20 Senior Vice President) that was filed on February 21, 2014 (ECF No. 666). In his declarations,
21 Mr. Wagner describes the competitive harm that Google would suffer if certain highly
22 confidential and highly sensitive details about Google’s compensation, hiring, and recruiting
23 practices that reflect Google’s internal deliberations and business strategy related to how Google
24 recruits and how Google sets and structures compensation (including salary, bonus and equity)
25 for its employees were made public. Mr. Kordestani’s Declaration describes the competitive
26 harm that Google would suffer if certain highly confidential and highly sensitive details about
27 Google’s contracts related to its business collaborations were made public.

Google's Confidential Information in the Combined Becker Report

6. The following portions of the **Combined Becker Report** contain highly confidential and sensitive details about Google's compensation practices, including details about an original and revised compensation proposal reflecting a change in Google's compensation program for Google employees and a detailed description of the reasons behind the change to Google's compensation program:

- a) Paragraph 34
- b) Paragraphs 38-40
- c) Paragraphs 82-84
- d) Paragraph 86
- e) Paragraph 112
- f) Paragraph 115
- g) footnote 86
- h) Paragraph 120
- i) Paragraph 123
- j) Paragraph 139
- k) Exhibits A1, A13, A14, A15, A16, A17, B1, B2, B3, B4, C1, C2, C3, D2
- l) Appendices A1, A13, A14, A15, A16, A17, B1, B2, B3 (charts related to Google only), B4, C1, C2 (Google chart only), C3, D2, and E3
- n) Attachment 3 re: job titles (all columns except first two columns)

Google's Confidential Information in the Hallock Reports

7. The following portions of the **05/2013 Hallock Report** contain confidential and highly sensitive details about Google's compensation, recruiting, and hiring strategies and practices and that reflect Google's internal deliberations and business strategy related to how Google sets and structures compensation for its employees, how Google might respond to competition for its employees from other rival employers, and how Google approaches recruiting and hiring:

- a) Page 13 (Para. 38) (text starting after “Gerhart (2011)” and through the end of Paragraph 38)
- b) Page 17 (Footnote 47)
- c) Page 40 (Para. 130) (text starting after “the ratings go from” and through the end of that sentence; and text in last sentence)
- d) Page 40 (Para. 131) (first sentence and all raw numbers in Paragraph 131)
- e) Page 40-41 (Para. 133) (only text in quotations in Paragraph 133)
- f) Page 63 (Para. 210) (region names and names of categories only)
- g) Page 63 (Para. 211)
- h) Page 63 (Para. 212) (only region names and raw numbers)
- i) Page 64 (Para. 215)
- j) Page 107 (Figure 7)
- k) Page 112 (Figure 12)
- l) Page 117 (Figure 17)

8. The following portions of the **10/2013 Hallock Report** contain highly sensitive and highly confidential details about how Google sets and structures different levels of compensation, how Google structures its compensation with respect to employee evaluations, and Google’s recruiting and employee retention strategies:

- a) Paragraph 26
- b) Paragraphs 118-119
- c) Paragraph 121
- d) Paragraphs 204-205
- e) Paragraph 208
- f) Figure 2
- g) Figure 7
- h) Figure 13

Google's Confidential Information in the Leamer Reports

9. The following portions of the **10/2012 Leamer Report** contain highly confidential and highly sensitive details about Google's compensation, recruiting, and hiring strategies and practices, including confidential details about Google's internal deliberations and business strategy related to making counteroffers as well as responding to competition from a rival employer in an effort to retain employees:

- a) Page 17, footnote 65 (rate of hires only)
- b) Page 23, Figures 3 and 4 (rows pertaining to Google)
- c) Page 27, footnote 101 (names of companies only)
- d) Page 45, footnote 129 (select portion of footnote)
- e) Page 45-46, footnote 135
- f) Page 46, Paragraph 109
- g) Page 46, footnote 139
- h) Page 48, Paragraph 115
- i) Page 49, Paragraph 119
- j) Page 49, footnote 155
- k) Page 53, Figure 10 (row pertaining to Google)
- l) Page 60, Figure 16

10. The following portions of the **12/2012 Leamer Report** contain highly confidential and highly sensitive details about Google's compensation, recruiting, and hiring strategies and practices, including confidential details about Google's internal deliberations and business strategy related to making counteroffers as well as responding to competition from a rival employer in an effort to retain employees:

- a) Page 24, Paragraph 53 (number and percentage of Google employees hired by a competitor)
- b) Page 24, footnote 69
- c) Page 25, Paragraph 54 (portions of last sentence)
- d) Page 26, Figure 1 (chart pertaining to Google)

e) Page 43, Figure 7 (chart pertaining to Google)

11. The following portions of the **05/2013 Leamer Report** contain highly sensitive and highly confidential details of how Google sets and structures compensation and how Google compensation relates to national averages over time:

a) Page 31, Figure 19 (charts titled “Google” and “All Defendants R&D”)

b) Exhibit 2 (Column titled “Job Title” and Column titled “Section 1” related to Google)

12. The following portions of the **07/2013 Leamer Report** contain highly confidential and highly sensitive data and other information relevant to Google’s recruiting, employee retention, and compensation strategies and practices:

a) Page 14, Paragraph 33 (raw percentage figures only)

b) Page 15, Tables 1 and 2

c) Page 16, Figure 1

d) Page 33, footnote 42

e) Page 36, Figure 8

13. The following portion of the **10/2013 Leamer Report** contains highly confidential class summary data:

a) Page 5, Figure 2 (only columns 3, 4 and 5 pertaining to Google).

14. The following portions of the **12/2013 Leamer Report** contain highly confidential information and details about Google’s compensation for its employees:

a) Table 1 (columns 3, 4 and 5 pertaining to Google)

b) Figure 8 (both charts pertaining to Google salaries)

c) Figure 14, Page 44 (regarding average total compensation)

d) Paragraph 5 of Appendix A on page 77 (dollar figures only pertaining to salary ranges)

Google’s Confidential Information in the Lewin Reports

15. The following portions of the **11/2013 Lewin Report** contain highly confidential and sensitive details about Google’s compensation practices, including details about an original

1 and revised compensation proposal reflecting a change in Google's compensation program for
 2 Google employees and a detailed description of the reasons behind the change to Google's
 3 compensation program:

4 a) Paragraph 46

5 b) Exhibits 13B, 13C, 15B, 15C, 16B, 16C

6 16. Google previously requested to seal portions of Exhibit 14B.1 to the **12/2013**
 7 **Lewin Report** (Exhibit 3 to Kahn Declaration ISO Defendants' Joint Opposition to Plaintiffs'
 8 Motion to Exclude Expert Testimony). Google is not renewing its motion as to those portions of
 9 Exhibit 3 to the Kahn Declaration and is submitting an unredacted version of that Exhibit
 10 herewith.

11 **Google's Confidential Information in the Manning Report**

12 17. The following portions of the **Manning Report** contain highly sensitive and
 13 highly confidential details of Google's compensation and recruiting philosophies, Google's
 14 compensation practices, and Google's counter-offering strategies:

15 a) Paragraph 53

16 b) Paragraph 63

17 **Google's Confidential Information in the Marx Report**

18 18. The following portions of the **Marx Report** contain highly sensitive and highly
 19 confidential details of Google's business collaborations and its recruiting strategies:

20 a) Paragraph 31

21 b) Paragraphs 33-34

22 **Google's Confidential Information in the Murphy Reports**

23 19. The following portions of the **11/2012 Murphy Report (Appendix E to the**
 24 **11/2013 Murphy Report)** contain highly confidential and highly sensitive information related to
 25 Google's recruiting and compensation practices and data. It is also my understanding that the
 26 Court previously granted Google's request to seal the below portion of this report in the Court's
 27 Order Granting in Part and Denying in Part Motions to Seal (Dkt. 509):

28 a) Page 13, footnote 20 (last clause of last sentence only, listing employers)

- b) Page 21, Paragraph 35 (figures in last sentence only)
- c) Page 25, Paragraph 43 (last two sentences only)
- d) Page 26, Paragraph 45 (portion of third sentence only)
- e) Pages 26-27, Paragraph 46 (fourth sentence only)
- f) Page 54, Paragraph 95 (percentage figures in last sentence only)
- g) Exhibits 3, 6, 7A, 7B, 8A, 8B, 9B, 10, 11B, 15B
- h) Appendices 1A, 1B, 1C, 1D, 2A, 2B, 2C, 2D, 3A, 3B, 4A, 4B, 4C, and 4D

20. The following portions of the **06/2013 Murphy Report (Appendix F to the 11/2013 Murphy Report)** contain highly confidential and highly sensitive data relating to how Google structures its compensation: June 21, 2013)

- a) Exhibit 1 (data related to Google regarding total compensation data)
- b) Exhibit 2 (data related to Google regarding total compensation changes data)
- c) Exhibit 3 (data related to Google regarding total compensation)
- d) Appendix B (distribution of yearly change in total compensation by job titles)

21. The following portions of the **11/2013 Murphy Report** contain highly confidential information and details about Google's compensation and recruiting and retention strategies for its employees:

- a) Paragraph 86 (text in last sentence that begins after "total compensation at Google" and that ends before "from 2010 to 2011")
- b) Paragraph 88 (text in second sentence that begins after "mean base salaries at Google," and text in third sentence starting after "(i.e., stocks and options)")
- c) Exhibit 4 on Page 40 (related to Google's base salary and total compensation in 2003)
- d) Footnote 128 (last sentence)
- e) Footnote 130 (figures related to Google employee attrition only)

f) Appendices C-2 and D-2.

g) Portions of Appendices E and F, which are prior Reports by Professor Murphy, as detailed in Paragraphs 18 and 19 above.

Google's Confidential Information in the Snyder Report

22. The following portions of the **Snyder Report** contain highly confidential compensation and recruiting data, including details about Google's sources for new hires and recruiting strategies and details about Google's hiring from and employee attrition to Intel Corp:

a) Paragraph 36

b) Paragraph 39(ii)

b) Exhibit 3a (figures pertaining to Google only).

Google's Confidential Information in the Stiroh Report

23. The following portions of the **Stiroh Report** contain highly confidential information and details about Google's compensation for its employees:

a) Paragraph 38 (compensation figures)

b) Paragraph 40 and footnote 85 (on pages 17-18)

c) Paragraph 41 and footnotes 86-87 (on page 18)

d) Paragraph 43

e) Paragraph 45 and footnotes 93-95, and footnote 100
(on Page 19-20)

f) Paragraph 46 and footnotes 102, 104 and 105 (on Page 20)

g) footnotes 109-110 (on Page 21)

h) Paragraph 47

i) Paragraph 82 (percentage figure related to percent increase in Google's compensation during 2003)

j) Paragraph 111 and footnote 207 (on Page 42)

k) Paragraph 112 and footnote 210

l) Paragraph 122 and footnote 225

m) Paragraph 135

- 1 n) Paragraph 138, and footnote 235 (on Page 51)
- 2 o) Paragraph 139 and footnote 239 (on Page 52)
- 3 p) Paragraphs 206-207
- 4 q) Paragraph 209
- 5 r) Exhibits III.17, III.18, III.19, III.20, III.21, III.22, III.23, III.24, III.54,
- 6 IV.1, IV.8, IV.12, IV.15, IV.19, IV.22, IV.27, IV.30, IV.33, IV.36, and VII.3.

7 **Google's Confidential Information in the Talley Report**

8 24. The following footnote in the **Talley Report** contains highly confidential data
9 related to Google's sources of new hires:

- 10 a) footnote 75 (page 19)

11 **Google's Confidential Information in Google's Motion for Summary Judgment**

12 25. The following lines of **Google's Motion for Summary Judgment** contain highly
13 confidential information and details about Google's cross-hiring among the defendants and data
14 related to Google's hiring and separations, as well as the sources of Google's hiring: Page 3,
15 lines 4, 7, 8, and 10 (numbers and figures only).

16 **Google's Confidential Information in Exhibits to the Selin Declaration**

17 26. The following exhibits to the Selin Declaration contain highly confidential
18 information and details about Google's recruiting, hiring, and compensation practices, including
19 highly confidential documents detailing Google's hiring and retention strategies:

- 20 a) **Exhibit 15**, an internal Google presentation, portions of which contain
21 highly confidential and sensitive details of Google's recruiting and hiring strategies and
22 practices; a proposed redacted version is being submitted concurrently herewith.
- 23 b) **Exhibit 16**, a chart, portions of which contain highly confidential and
24 sensitive details of the companies from which Google most often recruits new employees;
25 a proposed redacted version is being submitted concurrently herewith.
- 26 c) **Exhibit 17**, an internal Google document, portions of which contain
27 highly confidential and highly sensitive information regarding details of how Google
28

1 structures executive compensation and Google's strategies relating to compensation; a
2 proposed redacted version is being submitted concurrently herewith.

3 d) **Exhibit 18**, a presentation, portions of which contain highly sensitive and
4 confidential charts and other confidential details relating to Google's hiring and
5 recruiting data and recruiting strategies; a proposed redacted version is being submitted
6 concurrently herewith.

7 e) **Exhibit 19**, an internal Google document, portions of which contain
8 highly confidential and highly sensitive details of Google's recruiting and employee
9 retention strategies; a proposed redacted version is being submitted concurrently
10 herewith.

11 f) **Exhibit 34**, a table, portions of which contain confidential and highly
12 sensitive details of previous employers for new Google hires; a proposed redacted version
13 is being submitted concurrently herewith.

14 g) **Exhibit 35**, a table, portions of which contain highly confidential and
15 highly sensitive details of previous employers for new Google hires; a proposed redacted
16 version is being submitted concurrently herewith.

17 h) **Exhibit 36**, a table, portions of which contain highly confidential and
18 highly sensitive details of previous employers for new Google hires; a proposed redacted
19 version is being submitted concurrently herewith.

20 **Google's Confidential Information in Exhibits to the Harvey Declaration**

21 27. Google seeks to keep the following exhibits to the Harvey Declaration under seal
22 (proposed redacted versions of the below exhibits are being submitted concurrently herewith):

23 a) **Exhibit 69** (pages pertaining to Google and Apple business contracts)
24 contains highly confidential and sensitive information related to business contracts
25 between Apple and Google; a proposed redacted version is being submitted concurrently
26 herewith.

1 b) **Exhibit 70** contains highly confidential and sensitive information related
2 to a business contract between Apple and Google; a proposed redacted version is being
3 submitted concurrently herewith.

4 c) **Exhibit 71** contains highly confidential and sensitive information related
5 to a business contract between Apple and Google; a proposed redacted version is being
6 submitted concurrently herewith.

7 d) **Exhibit 72** contains highly confidential and sensitive information related
8 to a business contract between Apple and Google; a proposed redacted version is being
9 submitted concurrently herewith.

10 e) **Exhibit 73** contains highly confidential and sensitive information related
11 to a business contract between Apple and Google; a proposed redacted version is being
12 submitted concurrently herewith.

13 f) **Exhibit 74** contains highly confidential and sensitive information related
14 to a business contract between Apple and Google; a proposed redacted version is being
15 submitted concurrently herewith.

16 g) **Exhibit 76**, an e-mail chain, portions of which contain personally
17 identifying information; a proposed redacted version is being submitted concurrently
18 herewith.

19 h) **Exhibit 77**, an e-mail chain, portions of which contain highly sensitive
20 and confidential details about Google's practices relating to counteroffers, as well as
21 personally identifying information; a proposed redacted version is being submitted
22 concurrently herewith.

23 i) **Exhibit 78**, an e-mail chain, portions of which contain personally
24 identifying information; a proposed redacted version is being submitted concurrently
25 herewith.

26 j) **Exhibit 80**, a Google training document, portions of which contain highly
27 sensitive and confidential details about Google's training for recruiters; a proposed
28 redacted version is being submitted concurrently herewith.

1 k) **Exhibit 85**, a Google document, portions of which contain highly
2 sensitive and confidential details of Google recruiting data and programs; a proposed
3 redacted version is being submitted concurrently herewith.

4 l) **Exhibit 86**, an e-mail chain with attached documents, portions of which
5 contain highly sensitive and confidential details of Google's hiring policies and protocols;
6 a proposed redacted version is being submitted concurrently herewith.

7 m) **Exhibit 87**, a e-mail with a presentation attached, portions of which
8 contain highly sensitive and confidential charts and other confidential details relating to
9 Google's hiring and recruiting data and recruiting strategies; a proposed redacted version
10 is being submitted concurrently herewith.

11 n) **Exhibit 89**, a response provided to the U.S. Department of Justice,
12 portions of which contain highly sensitive and confidential hiring and recruiting data and
13 information about Google's business collaborations with IBM; a proposed redacted
14 version is being submitted concurrently herewith.

15 o) **Exhibit 90**, an economic analysis of Google's do not cold call policy,
16 portions of which contain highly sensitive and confidential details of Google hiring data
17 and Google's business collaborations with IBM; a proposed redacted version is being
18 submitted concurrently herewith.

19 p) **Exhibit 91**, a presentation, portions of which contain highly sensitive and
20 confidential details of Google's recruiting strategies and compensation policies; a
21 proposed redacted version is being submitted concurrently herewith.

22 q) **Exhibit 92**, a presentation, portions of which contain highly sensitive and
23 confidential details of how Google structures its compensation; a proposed redacted
24 version is being submitted concurrently herewith.

25 r) **Exhibit 93**, a presentation, portions of which contain highly sensitive and
26 confidential details of how Google structures its compensation; a proposed redacted
27 version is being submitted concurrently herewith.
28

1 s) **Exhibit 94**, a presentation, portions of which contain highly sensitive and
2 confidential details of how Google structures its compensation; a proposed redacted
3 version is being submitted concurrently herewith.

4 t) **Exhibit 95**, a Google document, portions of which contain highly
5 sensitive and confidential details of how Google structures its compensation and its
6 compensation strategies vis-à-vis competitors; a proposed redacted version is being
7 submitted concurrently herewith.

8 u) **Exhibit 96**, a presentation, portions of which contain highly sensitive and
9 confidential data and other details of Google's recruiting, hiring, and compensation
10 practices; a proposed redacted version is being submitted concurrently herewith.

11 v) **Exhibit 97**, a presentation, portions of which contain highly sensitive and
12 confidential details of Google's hiring and recruitment processes; a proposed redacted
13 version is being submitted concurrently herewith.

14 w) **Exhibit 98**, a presentation, portions of which contain highly sensitive and
15 confidential details of Google's strategies for recruiting and hiring candidates and details
16 of Google's compensation philosophy; a proposed redacted version is being submitted
17 concurrently herewith.

18 x) **Exhibit 100**, an e-mail chain, portions of which contain highly sensitive
19 and confidential details about Google's process for setting compensation; a proposed
20 redacted version is being submitted concurrently herewith.

21 y) **Exhibit 101**, a presentation, portions of which contain highly sensitive and
22 confidential details about Google's process for setting compensation for new hires; a
23 proposed redacted version is being submitted concurrently herewith.

24 z) **Exhibit 103**, charts, portions of which contain highly sensitive and
25 confidential details of how Google structures its compensation vis-à-vis several major
26 competitors; a proposed redacted version is being submitted concurrently herewith.

1 aa) **Exhibit 106**, an e-mail chain, portions of which contain highly sensitive
2 and confidential details about recruiting and hiring practices; a proposed redacted version
3 is being submitted concurrently herewith.

4 bb) **Exhibit 108**, an e-mail chain, portions of which contain personally
5 identifying information; a proposed redacted version is being submitted concurrently
6 herewith.

7 cc) **Exhibit 110**, an e-mail chain, portions of which contain personally
8 identifying information; a proposed redacted version is being submitted concurrently
9 herewith.

10 dd) **Exhibit 111**, minutes of a compensation committee meeting, portions of
11 which contain highly sensitive and confidential details about components of Google's
12 compensation program; a proposed redacted version is being submitted concurrently
13 herewith.

14 ee) **Exhibit 112**, a Google document, portions of which contain highly
15 sensitive and confidential details of Google's strategies in hiring, recruiting, retaining,
16 and compensating employees; a proposed redacted version is being submitted
17 concurrently herewith.

18 ff) **Exhibit 113**, a Google document on compensation, portions of which
19 contain highly sensitive and confidential details of Google's strategies in hiring,
20 recruiting, and compensating both new and existing employees; a proposed redacted
21 version is being submitted concurrently herewith.

22 gg) **Exhibit 114**, a Google document, portions of which contain highly
23 sensitive and confidential details of how Google hires, recruits, and retains employees; a
24 proposed redacted version is being submitted concurrently herewith.

25 hh) **Exhibit 115**, a Google document, portions of which contain highly
26 sensitive and confidential details of how Google hires, recruits, and retains employees; a
27 proposed redacted version is being submitted concurrently herewith.
28

1 ii) **Exhibit 117**, an e-mail chain, portions of which contain highly sensitive
2 and confidential details about Google's counteroffering strategy, as well as personally
3 identifying information; a proposed redacted version is being submitted concurrently
4 herewith.

5 jj) **Exhibit 118**, an e-mail chain, portions of which contain highly sensitive
6 and confidential details of Google's practices relating to counteroffers; a proposed
7 redacted version is being submitted concurrently herewith.

8 kk) **Exhibit 119**, an e-mail chain, portions of which contain highly sensitive
9 and confidential details of Google's practices relating to counteroffers and employee
10 compensation; a proposed redacted version is being submitted concurrently herewith.

11 ll) **Exhibit 120**, a presentation, portions of which contain highly sensitive and
12 confidential data and other details pertaining to how Google structures employee
13 compensation; a proposed redacted version is being submitted concurrently herewith.

14 mm) **Exhibit 121**, an e-mail chain, portions of which contain highly sensitive
15 and confidential details about Google's counteroffer strategies and how it structures
16 compensation; a proposed redacted version is being submitted concurrently herewith.

17 nn) **Exhibit 122**, a presentation, portions of which contain highly sensitive and
18 confidential details of Google's counteroffer strategies and data concerning employee
19 compensation; a proposed redacted version is being submitted concurrently herewith.

20 oo) **Exhibit 123**, a presentation, portions of which contain highly sensitive and
21 confidential details of Google's counteroffer strategies and data concerning employee
22 compensation; a proposed redacted version is being submitted concurrently herewith.

23 pp) **Exhibit 124**, a Google document, portions of which contain highly
24 sensitive and confidential details of how Google structures its compensation and its
25 compensation strategies vis-à-vis competitors; a proposed redacted version is being
26 submitted concurrently herewith.

27 qq) **Exhibit 125**, charts, portions of which contain highly sensitive and
28 confidential details of individual employee compensation and how Google sets and

1 structures compensation; a proposed redacted version is being submitted concurrently
2 herewith.

3 rr) **Exhibit 126**, charts, portions of which contain highly sensitive and
4 confidential details of individual employee compensation and how Google sets and
5 structures compensation; a proposed redacted version is being submitted concurrently
6 herewith.

7 ss) **Exhibit 127**, a business contract between Intel and Google, portions of
8 which contain highly sensitive and highly confidential details of business collaborations
9 between Intel and Google; a proposed redacted version is being submitted concurrently
10 herewith.

11 tt) **Exhibit 128**, a business contract between Intel and Google, portions of
12 which contain highly sensitive and highly confidential details of business collaborations
13 between Intel and Google; a proposed redacted version is being submitted concurrently
14 herewith.

15 uu) **Exhibit 129**, a business contract between Intel and Google, portions of
16 which contain highly sensitive and highly confidential details of business collaborations
17 between Intel and Google; a proposed redacted version is being submitted concurrently
18 herewith.

19 vv) **Exhibit 130**, a business contract between Intel and Google, portions of
20 which contain highly sensitive and highly confidential details of business collaborations
21 between Apple and Google; a proposed redacted version is being submitted concurrently
22 herewith.

23 ww) **Exhibit 131**, a business contract between Intel and Google, portions of
24 which contain highly sensitive and highly confidential details of business collaborations
25 between Intel and Google; a proposed redacted version is being submitted concurrently
26 herewith.

27 xx) **Exhibit 132**, a business contract between Intuit and Google, portions of
28 which contain highly sensitive and highly confidential details of business collaborations

1 between Intuit and Google; a proposed redacted version is being submitted concurrently
2 herewith.

3 yy) **Exhibit 133**, a business contract between Intuit and Google, portions of
4 which contain highly sensitive and highly confidential details of business collaborations
5 between Intuit and Google; a proposed redacted version is being submitted concurrently
6 herewith.

7 zz) **Exhibit 134**, a business contract between Apple and Google, portions of
8 which contain highly sensitive and highly confidential details of business collaborations
9 between Apple and Google; a proposed redacted version is being submitted concurrently
10 herewith.

11 aaa) **Exhibit 135**, a business contract between Apple and Google, portions of
12 which contain highly sensitive and highly confidential details of business collaborations
13 between Apple and Google; a proposed redacted version is being submitted concurrently
14 herewith.

15 bbb) **Exhibit 136**, a business contract between Apple and Google, portions of
16 which contain highly sensitive and highly confidential details of business collaborations
17 between Apple and Google; a proposed redacted version is being submitted concurrently
18 herewith.

19 ccc) **Exhibit 137**, a business contract between Apple and Google, portions of
20 which contain highly sensitive and highly confidential details of business collaborations
21 between Apple and Google; a proposed redacted version is being submitted concurrently
22 herewith.

23 ddd) **Exhibit 138**, a business contract between Apple and Google, portions of
24 which contain highly sensitive and highly confidential details of business collaborations
25 between Apple and Google; a proposed redacted version is being submitted concurrently
26 herewith.

27 eee) **Exhibit 139**, a business contract between Apple and Google, portions of
28 which contain highly sensitive and highly confidential details of business collaborations

1 between Apple and Google; a proposed redacted version is being submitted concurrently
2 herewith.

3 **Google's Confidential Information in Exhibits to the Cisneros Declaration**

4 28. Google also requests to seal discrete portions of the following exhibits attached to
5 the Cisneros Declaration (proposed redacted versions submitted herewith):

6 a) **Exhibit U**, excerpts from the deposition of Laszlo Bock taken on March
7 27, 2013, portions of which contain highly sensitive and confidential details of how
8 Google sets and structures compensation, Google's compensation philosophy, including
9 details relating to equity, bonuses, and other forms of compensation, specifically pages
10 38:4-6; 38:19-39:4; 39:9, 11-12, 18-22, 24-25; 40:1; 41:1; 44:16-17; 45:22-23; 52:3-8;
11 71:4-5; 72:11-12; 79:17-19; 79:21-80:2; 80:8-24; 81:2-6; 82:14, 21-23; 87:1-21; 93:22-
12 25; 95:20-21, 23-24; 96:7; a proposed redacted version is being submitted concurrently
13 herewith.

14 b) **Exhibit V**, excerpts from the deposition of Sergey Brin taken on March
15 19, 2013, portions of which contain highly sensitive and confidential details of Google's
16 counteroffers, hiring, and recruiting and personal information of individuals recruited by
17 Google, specifically pages 44:4; 59:1; 60:4; 111:24; 112:3, 6, 13; 113:2-3; 176: 22-23;
18 178:3-6, 15-18; 178:21-179:1; 179:14-16; 180:1-4, 10-14; 194:2-3, 13; a proposed
19 redacted version is being submitted concurrently herewith.

20 c) **Exhibit W**, excerpts from the deposition of Shona Brown taken on
21 January 30, 2013, portions of which contain highly sensitive and confidential details
22 about Google's employee rating system, how Google structures compensation, Google's
23 recruiting strategies, and changes in Google's compensation structure over time,
24 specifically pages 79:25-80:1; 80:10-12, 19-21, 23-24; 81:3-12, 18-19; 81:22-82:23;
25 83:6-11, 15-22; 96:9-10, 12-14, 17; 97:1-10; 232:1-11, 20-21; 233:1-4; 252:16-19; a
26 proposed redacted version is being submitted concurrently herewith.

27 d) **Exhibit X**, excerpts from the deposition of Alan Eustace taken on
28 February 27, 2013, portions of which contain highly sensitive and confidential details of

1 Google's hiring and recruiting strategies, how Google structures compensation, and
 2 Google's compensation philosophy, specifically pages 26:1-19; 36:1-8; 56:20; 133:1-11;
 3 134:11; 136:7-8; 136:17-137:1; 137:20-25; 167:23-168:6; 169:3-7, 9-11, 16, 20-25;
 4 170:7, 12; 182:8, 10; 184:1-11; a proposed redacted version is being submitted
 5 concurrently herewith.

6 e) **Exhibit Z**, excerpts from the deposition of Arnon Geshuri taken on
 7 August 17, 2012, portions of which contain highly sensitive and confidential details about
 8 Google's recruiting practices, specifically pages 63:6-7; 64:10; a proposed redacted
 9 version is being submitted concurrently herewith.

10 f) **Exhibit BB**, excerpts from the deposition of Jonathan Rosenberg taken on
 11 March 13, 2013, portions of which contain highly sensitive and confidential details about
 12 Google's policies and practices relating to counteroffers, specifically pages 115:6-7, 16,
 13 22, 24; 116:2-3, 7-9, 11, 14; 119:17-18; 119:24-120:2; 120:22-24; 121:16, 23-24; a
 14 proposed redacted version is being submitted concurrently herewith.

15 g) **Exhibit CC**, excerpts from the deposition of Eric Schmidt taken on
 16 February 20, 2013, portions of which contain highly sensitive and confidential details
 17 about Google's recruiting strategies, Google's counter-offering strategies, how Google
 18 structures compensation, personal information of individuals recruited by Google,
 19 specifically pages 44:2-5, 23-25; 46:1-5; 47:6-9; 103:5, 9; 104:25; 105:12, 20; 106:7;
 20 140:4; 178:25-179:4; 179:8-18; 204:15-18, 20-21; 205:2-7; 210:2-4; 210:21-211:3; a
 21 proposed redacted version is being submitted concurrently herewith.

22 h) **Exhibit DD**, excerpts from the deposition of Frank Wagner taken on
 23 March 7, 2013, portions of which contain highly sensitive and confidential details about
 24 how Google sets and structure compensation for new and current employees, Google's
 25 hiring practices and strategies, Google's counteroffer strategy, and changes in Google's
 26 compensation philosophy over time, specifically pages Ex. DD: Wagner: at 31:11-13;
 27 32:4-9, 14-19; 32:21-33:2; 33:12-20, 25; 35:14-17, 21-23; 35:25-36:9; 37:6-11, 14-14,
 28 17-18; 38:1-2, 6-7, 10-13; 39:21-23; 40:15-17; 47:20-48:6; 48:11-16, 18-24; 49:19-23;

1 51:19, 22-23; 52:2, 5-10, 11-15, 17-25; 56:17-57:8; 57:10-13, 18-20; 61:21-62:4; 62:6-8,
 2 12-14, 23-24; 63:1, 12-19; 63:25-64:9; 64:12-13, 20-21; 64:23-65:2; 65:5-19, 22-24;
 3 66:1-4, 7-8, 12-15, 18, 20-25; 75:11-21; 76:7-11; 132:17-19; 133:9-12; 134:7-15; 135:14-
 4 18; 136:1-9; 137:6-8; 139:6, 10-16; 159:10-18; 160:12-21; 170:15-19; 172:4-7, 9, 18-24;
 5 209:4-7, 12-15; 210:3-10, 12-16; 211:9-11; 213:16-17, 20-25; 215:1-2, 5-8, 11, 13-14;
 6 216:5-10, 13-24; 217:23-25; 223:4-6; a proposed redacted version is being submitted
 7 concurrently herewith.

8 i) **Exhibit JJ**, excerpts from the deposition of Paul Otellini taken on January
 9 29, 2013, portions of which contain highly sensitive and confidential details of how
 10 Google structures compensation, Google's counteroffer strategy, Google's hiring data,
 11 and personal information of an individual recruited by Google, specifically pages 29:1-4,
 12 9-14, 17; 30:3-12, 17-21; 158:15; 215:1-4; 216:3, 14-15; 218:1-11, 19-21; 219:3-6, 15-
 13 25; 220:10-11, 13-18; 221:5-10; 224:1-7, 10-12; 225:7, 9-10, 21-24; 226:3-4, 6-8; a
 14 proposed redacted version is being submitted concurrently herewith.

15 j) **Exhibit LL**, excerpts from the deposition of William Campbell taken on
 16 February 5, 2013, portions of which contain highly sensitive and confidential details
 17 about components of Google's compensation program and personal information of an
 18 individual recruited by Google, specifically pages 141:3-8, 10-13, 20; a proposed
 19 redacted version is being submitted concurrently herewith.

20 k) **Exhibit DDD**, excerpts from the deposition of Elizabeth Becker, Ph.D
 21 taken on December 10, 2013, portions of which contain highly sensitive and confidential
 22 details about components of Google's compensation, specifically page 185:8-9; a
 23 proposed redacted version is being submitted concurrently herewith.

24 l) **Exhibit HHH**, excerpts from the deposition of Kathryn Shaw, Ph.D taken
 25 on July 3, 2013, portions of which contain highly sensitive and confidential details of
 26 how Google structures its compensation and shifts in Google's compensation philosophy
 27 over time, specifically pages 167:18-19; 168:1, 3, 6; a proposed redacted version is being
 28 submitted concurrently herewith.

1 m) **Exhibit JJJ**, excerpts from the deposition of Lauren Stiroh, Ph.D taken on
2 December 9, 2013, portions of which contain highly sensitive and confidential details
3 about how Google sets its compensation and its retention strategies, specifically page:
4 311:13, 23; a proposed redacted version is being submitted concurrently herewith.

5 n) **Exhibit KKK**, excerpts from the deposition of Eric L. Talley, J.D., Ph.D
6 taken on December 8, 2013, portions of which contain highly sensitive and confidential
7 details of business collaborations between Google and its partners, including specific
8 terms in the agreements and Google's employment data, specifically pages 216:19;
9 217:1-3, 12-14; 218:24-219:2; 219:4; 242:3-5; a proposed redacted version is being
10 submitted concurrently herewith.

11 o) **Exhibit PPP**, excerpts from the deposition of Kevin Hallock taken on
12 June 7, 2013, portions of which contain highly sensitive and confidential details of a
13 Google's compensation system and strategies, specifically pages: 100:18-19; 101:2, 5-6;
14 102:17-18, 21, 23-25; a proposed redacted version is being submitted concurrently
15 herewith.

16 p) **Exhibit 172**, a presentation, portions of which contain highly sensitive and
17 confidential charts and other confidential details relating to Google's hiring and
18 recruiting data and recruiting strategies; a proposed redacted version is being submitted
19 concurrently herewith.

20 q) **Exhibit 173**, a Google document, portions of which contain highly
21 sensitive and confidential data and analyses relating to Google's compensation,
22 recruiting, and employee retention practices; a proposed redacted version is being
23 submitted concurrently herewith.

24 r) **Exhibit 175**, an e-mail chain, portions of which contain personally
25 identifying information; a proposed redacted version is being submitted concurrently
26 herewith.

1 s) **Exhibit 176**, an e-mail chain, portions of which contain personally
2 identifying information; a proposed redacted version is being submitted concurrently
3 herewith.

4 t) **Exhibit 190**, an e-mail chain, portions of which contain personally
5 identifying information; a proposed redacted version is being submitted concurrently
6 herewith.

7 u) **Exhibit 192**, an e-mail chain, portions of which contain personally
8 identifying information; a proposed redacted version is being submitted concurrently
9 herewith.

10 v) **Exhibit 200**, an e-mail chain, portions of which contain personally
11 identifying information; a proposed redacted version is being submitted concurrently
12 herewith.

13 w) **Exhibit 201**, an e-mail chain, portions of which contain highly sensitive
14 and confidential details relating to Google's recruitment and hiring of employees from a
15 competitor; a proposed redacted version is being submitted concurrently herewith.

16 x) **Exhibit 204**, an e-mail chain, portions of which contain personally
17 identifying information; a proposed redacted version is being submitted concurrently
18 herewith.

19 y) **Exhibit 278**, an e-mail chain, portions of which contain personally
20 identifying information; a proposed redacted version is being submitted concurrently
21 herewith.

22 z) **Exhibit 279**, an e-mail chain, portions of which contain personally
23 identifying information; a proposed redacted version is being submitted concurrently
24 herewith.

25 aa) **Exhibit 389**, a Google document, portions of which contain highly
26 sensitive and confidential details of Google's compensation philosophy and employee
27 retention strategies; a proposed redacted version is being submitted concurrently
28 herewith.

1 bb) **Exhibit 471**, an e-mail chain, portions of which contain highly sensitive
2 and confidential details of Google's recruiting practices, including other companies from
3 which Google was recruiting; a proposed redacted version is being submitted
4 concurrently herewith.

5 cc) **Exhibit 472**, an e-mail chain, portions of which contain highly sensitive
6 and confidential details of Google's counteroffer and compensation strategies; a proposed
7 redacted version is being submitted concurrently herewith.

8 dd) **Exhibit 608**, an e-mail chain, portions of which contain highly sensitive
9 and confidential details about Google's strategies relating to counteroffers; a proposed
10 redacted version is being submitted concurrently herewith.

11 ee) **Exhibit 614**, an e-mail chain, portions of which contain highly sensitive
12 and confidential details of discussions within Google about its policies relating to
13 counteroffers; a proposed redacted version is being submitted concurrently herewith.

14 ff) **Exhibit 616**, an e-mail chain, portions of which contain highly sensitive
15 and confidential details about Google's recruiting practices and compensation policies,
16 including compensation data for an individual employee; a proposed redacted version is
17 being submitted concurrently herewith.

18 gg) **Exhibit 621**, an e-mail chain, portions of which contain highly sensitive
19 and confidential details about Google's compensation practices; a proposed redacted
20 version is being submitted concurrently herewith.

21 hh) **Exhibit 626**, an e-mail chain, portions of which contain highly sensitive
22 and confidential details of Google's recruiting strategies; a proposed redacted version is
23 being submitted concurrently herewith.

24 ii) **Exhibit 635**, an e-mail chain, portions of which contain highly sensitive
25 and confidential data relating to Google recruiting and hiring employees from other
26 companies; a proposed redacted version is being submitted concurrently herewith.

1 jj) **Exhibit 648**, an e-mail chain, portions of which contain personally
2 identifying information; a proposed redacted version is being submitted concurrently
3 herewith.

4 kk) **Exhibit 650**, an e-mail chain, portions of which contain personally
5 identifying information; a proposed redacted version is being submitted concurrently
6 herewith.

7 ll) **Exhibit 653**, an e-mail chain, an e-mail chain, portions of which contain
8 personally identifying information; a proposed redacted version is being submitted
9 concurrently herewith.

10 mm) **Exhibit 660**, an e-mail chain, portions of which contain highly sensitive
11 and confidential details about components of Google's compensation practices; a
12 proposed redacted version is being submitted concurrently herewith.

13 nn) **Exhibit 666**, an e-mail chain, portions of which contain confidential
14 personally identifying information; a proposed redacted version is being submitted
15 concurrently herewith.

16 oo) **Exhibit 667**, an e-mail chain, portions of which contain personally
17 identifying information; a proposed redacted version is being submitted concurrently
18 herewith.

19 pp) **Exhibit 668**, an e-mail chain, portions of which contain personally
20 identifying information; a proposed redacted version is being submitted concurrently
21 herewith.

22 qq) **Exhibit 674**, an e-mail chain, portions of which contain highly sensitive
23 and confidential details of product strategies, business collaborations, and practices for
24 compensating and promoting employees; a proposed redacted version is being submitted
25 concurrently herewith.

26 rr) **Exhibit 872**, an e-mail, portions of which contain personally identifying
27 information; a proposed redacted version is being submitted concurrently herewith.
28

1 ss) **Exhibit 1600**, several charts, portions of which contain highly sensitive
2 and confidential details about how Google structures compensation for both incoming
3 and current employees; a proposed redacted version is being submitted concurrently
4 herewith.

5 tt) **Exhibit 1606**, a presentation, portions of which contain highly sensitive
6 and confidential details of how Google structures its compensation; a proposed redacted
7 version is being submitted concurrently herewith.

8 uu) **Exhibit 1609**, a presentation, portions of which contain highly sensitive
9 and confidential details about how Google sets and structures compensation; a proposed
10 redacted version is being submitted concurrently herewith.

11 vv) **Exhibit 1613**, an e-mail chain, portions of which contain highly sensitive
12 and confidential details of how Google structures compensation; a proposed redacted
13 version is being submitted concurrently herewith.

14 ww) **Exhibit 1618**, an e-mail chain with an attached document, portions of
15 which contain highly sensitive and confidential details of Google's compensation
16 philosophy and how it structures compensation; a proposed redacted version is being
17 submitted concurrently herewith.

18 xx) **Exhibit 1625**, a Google document, portions of which contain highly
19 sensitive and confidential details about a proposed change in how Google sets and
20 structures compensation; a proposed redacted version is being submitted concurrently
21 herewith.

22 yy) **Exhibit 1629**, an e-mail, portions of which contain highly sensitive and
23 confidential details about costs associated with a component of Google's compensation
24 program; a proposed redacted version is being submitted concurrently herewith.

25 zz) **Exhibit 1741**, a Google document, portions of which contain highly
26 sensitive and confidential details about Google hiring policies and protocols and how
27 Google structures compensation for new employees; a proposed redacted version is being
28 submitted concurrently herewith.

1 aaa) **Exhibit 1753**, an e-mail chain, portions of which contain highly sensitive
2 and confidential details about Google's recruiting strategies and practices; a proposed
3 redacted version is being submitted concurrently herewith.

4 bbb) **Exhibit 2249**, an e-mail chain, portions of which contain highly sensitive
5 and highly confidential details about business collaborations and negotiations between
6 Apple and Google; a proposed redacted version is being submitted concurrently herewith.

7 ccc) **Exhibit 2262**, an e-mail chain, portions of which contain highly sensitive
8 and highly confidential details about business collaborations and negotiations between
9 Apple and Google; a proposed redacted version is being submitted concurrently herewith.

10 ddd) **Exhibit 2362**, a business contract between Intuit and Google, portions of
11 which contain highly sensitive and highly confidential details of business collaborations
12 between Intuit and Google; a proposed redacted version is being submitted concurrently
13 herewith.

14 eee) **Exhibit 2364**, a business contract between Intuit and Google, portions of
15 which contain highly sensitive and highly confidential details of business collaborations
16 between Intuit and Google; a proposed redacted version is being submitted concurrently
17 herewith.

18 fff) **Exhibit 2366**, a business contract between Intuit and Google, portions of
19 which contain highly sensitive and highly confidential details of business collaborations
20 between Intuit and Google; a proposed redacted version is being submitted concurrently
21 herewith.

22 ggg) **Exhibit 2422**, an e-mail chain, portions of which contain highly sensitive
23 and confidential details about how Google structures employee compensation for several
24 positions within the company; a proposed redacted version is being submitted
25 concurrently herewith.

26 hhh) **Exhibit 2425**, a chart, portions of which contain highly sensitive and
27 confidential data revealing how Google structures employee compensation; a proposed
28 redacted version is being submitted concurrently herewith.

ggg) **Exhibit 2426**, a Google document, portions of which contain highly sensitive and confidential details about how Google structures executive compensation and bonuses; a proposed redacted version is being submitted concurrently herewith.

Google's Confidential Information in Exhibits to the Evans Declaration

29. Google requests to seal discrete portions of the following exhibits attached to the Evans Declaration (proposed redacted versions submitted herewith):

a) **Exhibit 1**, excerpts from the deposition of Eric Schmidt taken on February 20, 2013, portions of which contain personal identifying information an individual recruited by Google, specifically Page 165:2.

30. Based on the declarations submitted by Frank Wagner (ECF Nos. 201, 221, 261) and Omid Kordestani (ECF No. 666), the information identified in Paragraphs 6-29 above is highly confidential and highly sensitive commercial information, from which Google derives economic benefit by maintaining its confidentiality. Google does not disclose this information to its competitors, customers or the general public. *Id.* Public disclosure of this information would likely result in competitive harm to Google by giving third parties, including its competitors, direct insight into confidential and sensitive aspects of Google's internal decision-making processes and business strategy related to employee compensation and recruiting and into contracts related to Google's business collaborations. *Id.*

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on April 10, 2014 in Palo Alto, California. /s/ Anne M. Selin
Anne M. Selin